

Exhibit 1

Privilege Log*Kerrikkattil v. Hrabowski, et al.*

USDC

Case No.: WMN-13-02016

As of April 21, 2014

Bates Numbers	Document Description	From	To	CC:	Reason For Privilege
DEF 126	Email	David Gleason	Paul Dillon		Attorney Client Privilege
DEF 127	Email	David Gleason	Paul Dillon		Attorney Client Privilege
DEF 522	Email	Ginny Kellman	Christopher Tkacik		Attorney Client Privilege
DEF 526	Email	Christopher Tkacik	Ginny Kellman, Jeff Cullen, Student Judicial Program		Attorney Client Privilege
DEF 538 - 545	Email	Jeff Cullen	Christopher Tkacik	David Gleason, Nancy Young	Attorney Client Privilege
DEF 759	Email	Christopher Tkacik	Jeff Cullen	Ginny Kellman	Attorney Client Privilege
DEF 871 - 878	Email	Jeff Cullen	Christopher Tkacik	David Gleason, Nancy Young	Attorney Client Privilege
DEF 1107	Email	Christopher Tkacik	Jeff Cullen	Ginny Kellman	Attorney Client Privilege
DEF 1130	Email	Jeff Cullen	Davonya Hall		Attorney Client Privilege
DEF 1132	Email	Davonya Hall	Ranjith Keerikkattil		Attorney Client Privilege
DEF 1133	Email	Jack Suess	Davonya Hall, Christopher Tkacik		Attorney Client Privilege
DEF 1133 - 1134	Email	Christopher Tkacik	Jack Suess, Davonya Hall		Attorney Client Privilege
DEF 1167 - 1170	Email	Jeff Cullen	Christopher Tkacik		Attorney Client Privilege
DEF 1180 - 1197	Email	Susan Mcguire	Christopher Tkacik		Attorney Client Privilege
DEF 1202 - 1205	Email	Christopher Tkacik	Kim Leisey, Nancy Young, Paul Dillon, Jeff Cullen		Attorney Client Privilege
DEF 1268 - 1270	Email	Christopher Tkacik	Paul Dillon		Attorney Client Privilege

DEF 1513-1592		Sanction letters to Students	Jeff Cullen, Davonya Hall	Students		FERPA
DEF 1593-1596		Chart of Student Misconduct				FERPA
DEF 1597-1599		Email	Jeff Cullen	Nancy Young	Kim Leisey	FERPA
DEF 1600-1707		Paul Dillon phone Records				Beyond scope
DEF 1708-1709		Email	Kim Leisey	Student		FERPA
DEF 1710		Email	Paul Dillon	Student		FERPA
DEF 1712		Email	Paul Dillon	Student		FERPA
DEF 1714		Email	Paul Dillon	Student		FERPA
DEF 1719		Email re: Student Advisory Board	Paul Dillon; Kim Leisey	Students		FERPA
DEF 1721		Email re: Student Advisory Board	Paul Dillon; Kim Leisey	Students		FERPA
DEF 1723		Email re: Student Advisory Board	Paul Dillon; Kim Leisey	Students		FERPA
DEF 1759		Email re: Student Advisory Board	Paul Dillon; Kim Leisey	Students		FERPA
DEF 1761		Email re: Student Advisory Board	Paul Dillon; Kim Leisey	Students		FERPA
DEF 1762-1763		Email re: Student Advisory Board	Paul Dillon; Kim Leisey	Students		FERPA
DEF 1766-1767		Email re: Student Advisory Board	Paul Dillon; Kim Leisey	Students		FERPA
DEF 1770-1771		Email re: Student Advisory Board	Paul Dillon; Kim Leisey	Students		FERPA
DEF 1775		Email re: Student Advisory Board	Paul Dillon; Kim Leisey	Students		FERPA

DEF 1784	Email re: Student Advisory Board	Paul Dillon; Kim Leisey	Students		FERPA
DEF 1989	Student Advocate List				FERPA
DEF 1991	Student Advocate Small Group Meeting Outline				FERPA
DEF 1992- 2008	UMBC Student Incident Reports				FERPA
DEF 2009	Letter	Jeff Cullen	Student		FERPA
DEF 2010	De/Keerikkattil Police Report				FERPA
DEF 2015- 2017	UMBC Full CAD Police Reports				FERPA
DEF 2018- 2163	Sanction letters	Jeff Cullen	Students		FERPA
DEF 2164- 2167	Rule 2 Ltr (2006)				Beyond Scope
DEF 2168- 2194	Sanction Letters	Jeff Cullen	Students		FERPA
DEF 2197- 2206	Sanction Letters	Jeff Cullen	Students		FERPA
DEF 2207	Email	Kim Leisey	Student		FERPA
DEF 2208- 2209	Sanction Letters	Jeff Cullen	Students		FERPA
DEF 2949	Paul Dillon Resume				Beyond scope
DEF 2954- 2983	Student Hearing Board Applications				FERPA



Ranjith Keerikkattil <rkeerikkattil@gmail.com>

privilege log issues

Delfosse, Erik <edelfosse@oag.state.md.us>

Sun, May 4, 2014 at 1:53 AM

To: Ranjith Keerikkattil <rkeerikkattil@gmail.com>

Cc: pdillon <pdillon@umbc.edu>, Jeff Cullen <jcullen@umbc.edu>, "Dodge, Maria" <mdodge@oag.state.md.us>, David Gleason <gleason@umbc.edu>

Dear Mr. Keerikkattil,

I am getting back to you as previously indicated.

Attached is the updated privilege log. I have reviewed it and believe certain corrections, additional disclosures and explanations are necessary.

1. DEF 000126-127: The documents are mislabeled on the privilege list and will be produced.
2. DEF 000130: This document will be produced in redacted form as it contains unprivileged documents. The redacted portion will be withheld under the attorney client privilege.
3. DEF 000132: This document was an email chain produced in redacted form and all redactions were made subject to the attorney client privilege.

For all documents withheld pursuant to the attorney/client privilege, the documents contain communications from one or more individuals within UMBC's general counsel's office to employees of UMBC or the Board of Regents and contain advice on matters and facts relating to this case.

In addition to the above, certain documentation was withheld because it exceeded the scope of the agreed upon discovery:

1. DEF 001600-1707, 002949: The personal identifying information of Mr. Dillon's phone records and resume was redacted as beyond the scope of the agreed upon discovery.

2. DEF 02164-2167: This document is a Rule 2 letter from 2006 that is beyond the scope of the scope of the agreed upon discovery.

All documents being withheld pursuant to FERPA contain personally identifying information and is being withheld pursuant to the discretion set forth in the statute. For the documents in question, the withholding is either mandatory or permissive under that statute.

Erik James Delfosse

Senior Counsel, Litigation

Educational Affairs Division

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Privilege Log Complete.docx

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